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7 Attorney for Alfonzo Lee Womack

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ALFONZO LEE WOMACK,
15 Defendant.
16

Case No. 2:20-cr-00338-JAD-VCF

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(Third Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for
21 Alfonzo Lee Womack, that the previously ordered deadline for filing of pretrial motions be
22 vacated and that the parties herein shall have to and including May 31, 2021, within which to
23 file the Defendant's pretrial motions currently due May 13, 2021.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
25 shall have to and including June 14, 2021, to file any and all responsive pleadings, currently
26 due May 27, 2021.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including June 21, 2021, to file any and all replies to dispositive motions,
3 currently due June 3, 2021.

4 The Stipulation is entered into for the following reasons:

- 5 1. Counsel for the defendant needs additional time to review the discovery and to
6 determine whether to file a pretrial motion.
- 7 2. The defendant is incarcerated and does not object to the continuance.
- 8 3. The parties agree to the continuance.
- 9 4. The additional time requested herein is not sought for purposes of delay, but
10 merely to allow counsel for defendant sufficient time within which to discuss the proposed
11 resolution with his client.
- 12 5. Additionally, denial of this request for continuance could result in a miscarriage
13 of justice.

14 This is the third stipulation to continue filed herein.

15 DATED this 7th day of May 2021.

16 RENE L. VALLADARES
17 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

18 */s/ Nisha Brooks-Whittington*
19 By _____

/s/ Daniel J. Cowhig
By _____

20 NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

DANIEL J. COWHIG
Assistant United States Attorney

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Case No. 2:20-cr-00338-JAD-VCF

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

ALFONZO LEE WOMACK.,

Defendant.

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to review the discovery and to determine whether to file a pretrial motion.
2. The defendant is incarcerated and does not object to the continuance.
3. The parties agree to the continuance.
4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to discuss the proposed resolution with his client.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

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ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including May 31, 2021, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including June 14, 2021, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including June 21, 2021, to file any and all replies to dispositive motions.

DATED this 13th day of May 2021.


UNITED STATES DISTRICT JUDGE